

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WASHTENAW COUNTY EMPLOYEES'  
RETIREMENT SYSTEM, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALGREEN CO. et al.,

Defendants.

Civil Action No. 1:15-cv-3187

Honorable Sharon Johnson Coleman

**CLASS COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND  
LITIGATION EXPENSES**

Court-appointed Class Counsel, Kessler Topaz Meltzer & Check, LLP, respectfully moves this Court, on behalf of Plaintiff's Counsel, for entry of an Order awarding attorneys' fees and Litigation Expenses.<sup>1</sup>

This Motion is made pursuant to Rules 23(e) and 23(h) of the Federal Rules of Civil Procedure and is supported by the following documents filed herewith: (i) the Memorandum of Law, (ii) the Joint Declaration, (iii) the Declaration of Andrew L. Zivitz on Behalf of Kessler Topaz Meltzer & Check, LLP in Support of Class Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses, (iv) the Declaration of James E. Barz Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys' Fees and Expenses, (v) the Declaration of Jan Østergaard on behalf of Industriens Pensionsforsikring A/S, and (vi) the Stipulation, as well as the other papers and proceedings herein.

Dated: September 2, 2022

Respectfully submitted,

**KESSLER TOPAZ  
MELTZER & CHECK, LLP**

/s/ Andrew L. Zivitz

Andrew L. Zivitz (*Pro Hac Vice*)  
David Kessler (*Pro Hac Vice*)  
Johnston de F. Whitman (*Pro Hac Vice*)  
David A. Bocian (*Pro Hac Vice*)  
Michelle M. Newcomer (*Pro Hac Vice*)  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056  
azivitz@ktmc.com  
dkessler@ktmc.com  
jwhitman@ktmc.com  
dbocian@ktmc.com

---

<sup>1</sup> Capitalized terms have the meanings set forth in the Stipulation and Agreement of Settlement dated June 23, 2022 (Doc. 505) ("Stipulation") or in the Joint Declaration of David Kessler and Andrew L. Zivitz in Support of (I) Class Representative's Motion for Final Approval of Settlement and Plan of Allocation; and (II) Class Counsel's Motion for an Award of Attorneys' Fees and Litigation Expenses ("Joint Declaration") filed herewith.

mnewcomer@ktmc.com

*Class Counsel for the Class*

**ROBBINS GELLER RUDMAN  
& DOWD LLP**

James E. Barz (No. 6255605)  
Frank A. Richter (No. 631001)  
200 South Wacker Drive, 31st Floor  
Chicago, IL 60606  
Telephone: (312) 674-4674  
Facsimile: (312) 674-4676  
[jbarz@rgrdlaw.com](mailto:jbarz@rgrdlaw.com)  
[frichter@rgrdlaw.com](mailto:frichter@rgrdlaw.com)

*Liaison Counsel for the Class*